

**IN THE CIRCUIT COURT OF
CHAPEL COUNTY, ALABAMA**

SHANNON SPAIN, a minor,)	
by and through his/her parent,)	
JAMIE SPAIN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action NO. 2017-7797
)	
LINN ANDERSON, a minor,)	
by and through his/her parent,)	
SAM ANDERSON,)	
)	
Defendant.)	

CASE SUMMARY

This case is a civil action filed by Shannon Spain against Linn Anderson. Spain played for Pleasantville High School, and Anderson played for the Centreville High School team in a semifinal playoff game in May 2016. Spain was injured when Anderson made a play for the ball. Spain alleges that s/he suffered severe back injuries as a result of the incident. Generally, a player engaged in sports assumes the risk of injury from any contact normally associated with the play of that game.

However, in this case, Spain alleges that Anderson was negligent because Anderson’s contact was outside the rules of the game and that Anderson used force which was excessive and beyond the amount of force that a reasonable player would have used under the circumstances. Spain also alleges that the contact constitutes a battery.

For the purposes of this case, the FIFA “Laws of the Game” apply and you may access these on the FIFA.com website. Anderson asserts that her/his actions were within the accepted bounds of the game, the force used was not excessive and that the contact was legal within the rules of the game. Anderson asserts the defense of assumption of the risk and contributory negligence.

**IN THE CIRCUIT COURT OF
CHAPEL COUNTY, ALABAMA**

SHANNON SPAIN, a minor,)
by and through his/her parent,)
JAMIE SPAIN,)

Plaintiff,)

v.)

LINN ANDERSON, a minor,)
by and through his/her parent,)
SAM ANDERSON,)

Defendant.)

Civil Action NO. 2017-7797

**Witnesses, Exhibits, Stipulations
and Legal Authorities**

WITNESSES

The following witnesses may be called by the parties:

For the Plaintiff:

Plaintiff- Shannon Spain
ER Doctor- Blake Norman, M.D.
Rival Team Coach- Terry Dillon

For the Defense:

Defendant- Linn Anderson
Professional Athlete- Cameron Strong
Eyewitness- Taylor Brown

All Witnesses May Be Male or Female

EXHIBITS

- Exhibit 1- ER report for Shannon Spain
- Exhibit 2- Rules for Secondary Athletic Soccer Association Referees
- Exhibit 3- Article Written by Cameron Strong
- Exhibit 4- Mayberry Mudcats Team Schedule
- Exhibit 5- Transcript of Voicemail from Shannon Spain to Linn Anderson

STIPULATIONS

1. All exhibits included in the case are authentic and accurate in all respects. No objections to the authenticity of the exhibits will be entertained.
2. The signatures of the witnesses are authentic.
3. In arguing legal issues, the parties may rely upon the legal authorities provided below and the jury charges provided with this case.

4. The ER report is admissible without further foundation. No hearsay objection to this document will be entertained. However, if any hearsay is contained in this report, hearsay objections shall be entertained as to those portions of the report which may contain hearsay.

LEGAL AUTHORITIES AND JURY CHARGES

I. NEGLIGENCE– DEFINITION

Negligence is the failure to discharge or perform a legal duty owed to the other party.

II. FINDINGS– ONE PLAINTIFF, ONE DEFENDANT

If you are reasonably satisfied from the evidence that the defendant was negligent and that the defendant's negligence proximately caused the alleged injury or damage, then your verdict must be for the plaintiff; however, if you find that the defendant was not negligent or if you find that the defendant's negligence was not the proximate cause of the plaintiff's injury or damage, then your verdict must be for the defendant.

III. NEGLIGENCE AND ORDINARY CARE

Negligence means the failure to exercise reasonable, ordinary care; that is, such care as a reasonably prudent person would have exercised under the same or similar circumstances. Therefore, "negligence" is the failure to do what a reasonably prudent person would have done under the same or similar circumstances, or, the doing of something which a reasonably prudent person *would* not have done under the same or similar circumstances.

IV. CHILD 14 YEARS OF AGE AND OVER

All normal children 14 years of age and above are conclusively presumed by law to possess that maturity of discretion which belongs to adults of ordinary prudence, and the general rules of law applicable to adults also apply to them. If you are reasonably satisfied from the evidence that the defendant at the time of the occasion complained of was a normal child 14 years of age or older, then you would consider and determine whether or not he (she) was guilty of negligence.

V. BATTERY– DEFINITION AND BURDEN OF PROOF

Any touching by one person of the person or clothes of another in rudeness, or in anger, or in a hostile manner, is an assault and battery. An intent to injure is not an essential element. The plaintiff has the burden of reasonably satisfying you by the evidence that the defendant committed an assault and battery upon him.

VI. DAMAGES– GENERAL

Compensatory or actual damages are allowed and should be awarded where the plaintiff reasonably satisfies the jury from the evidence that plaintiff has been injured or damaged as a proximate result of an act of negligence on the part of the defendant, [or where the plaintiff reasonably satisfies the jury from the evidence that plaintiff has been willfully or wantonly injured by the defendant]. Punitive or exemplary damages are allowed to the plaintiff and may be awarded in the sound discretion of the jury in cases where the plaintiff proves by clear and convincing evidence that the defendant consciously or deliberately engaged in oppression, fraud, wantonness, or malice with regard to the plaintiff.

VII. DAMAGES– COMPENSATORY

The purpose of awarding compensatory damages is to fairly and reasonably compensate the injured party for the loss or injury sustained. Compensatory damages are intended as monetary compensation to the party wronged, to compensate him for his injury, and other damages which have been inflicted upon him as a proximate result of the wrong complained of.

VIII. DAMAGES– PUNITIVE

The purpose of awarding punitive or exemplary damages is to allow money recovery to the plaintiff by way of punishment to the defendant and for the added purpose of protecting the public by deterring the defendant and others from doing such wrong in the future. The imposition of punitive damages is entirely discretionary with the jury. Should you award punitive damages, in fixing the amount, you must take into consideration the character and degree of the wrong as shown by the evidence in the case, and the necessity of preventing similar wrongs.

For a plaintiff to be entitled to recover punitive damages, the plaintiff must prove by clear and convincing evidence that the defendant consciously or deliberately engaged in oppression, fraud, wantonness, or malice with regard to the plaintiff. Clear and convincing evidence means evidence that, when weighed against evidence in opposition, will produce in the mind of the trier of fact a firm conviction as to each essential element of the claim and a high probability as to the correctness of the conclusion. (Proof by clear and *convincing evidence* requires a *level of proof* greater than a preponderance of the evidence or the substantial weight of the evidence, but less than beyond a reasonable doubt.)

IX. PERSONAL INJURY– PHYSICAL PAIN AND MENTAL ANGUISH

The law has no fixed monetary standard to compensate for physical pain and mental anguish. This element of damage is left to your good sound judgment and discretion as to what amount would reasonably and fairly compensate the plaintiff for such physical pain and mental anguish

as you find from the evidence the plaintiff did suffer. If you are reasonably satisfied from the evidence that the plaintiff has undergone [or will undergo] pain and suffering or mental anguish as a proximate result of the injury in question, you should award a sum which will reasonably and fairly compensate him for such pain, suffering, or mental anguish [already] suffered by him [and for any pain, suffering or mental anguish which you are reasonably satisfied from the evidence that he is reasonably certain to suffer in the future].

X. CONTRIBUTORY NEGLIGENCE

Contributory negligence is negligence **on the** part of the plaintiff that proximately contributed to the alleged (injury) (death) (property damage). The defendant's answer raising contributory negligence is an affirmative defense. Therefore, the burden is upon the defendant to reasonably satisfy you from the evidence as to the truth of all of the material allegations of this defense.

XI. CHILD 14 YEARS OF AGE AND OVER

All normal children 14 years of age and above are conclusively presumed by law to possess that maturity of discretion which belongs to adults of ordinary prudence, and the general rules of law applicable to adults also apply to them. If you are reasonably satisfied from the evidence that the plaintiff at the time of the occasion complained of was a normal child 14 years of age or older, then you would consider and determine whether or not he (she) was guilty of contributory negligence.

XII. ASSUMPTION OF RISK—ELEMENTS

The three elements essential to assumption of risk (or contributory negligence) in cases of this kind are that the party charged with assumption of risk (or contributory negligence) (1) had knowledge of the existence of the dangerous condition and (2) with appreciation of such danger (3) failed to exercise care for his (her) own safety by putting himself (herself) in the way of such known danger.

FACTS

4. Prior to and on the date of May 15, 2016, Plaintiff was a member of the Pleasantville Panthers soccer team.

5. On or about May 15, 2016, the Pleasantville Panthers were engaged in playing a soccer game with the Centreville Stars. The game was being played at Pleasantville High School located in Pleasantville, Chapel County, Alabama.

6. Defendant Anderson was a member of the Centreville Stars soccer team.

7. During the play of the game, Defendant Anderson struck Plaintiff with excessive force such that Plaintiff was severely injured.

8. Said force used by Defendant Anderson was greatly exceeded the amount of force considered reasonable and customary in a game of soccer.

9. As a result, Plaintiff has suffered extreme physical pain and mental anguish and suffering. Plaintiff has also incurred medical bills and continues to incur medical bills and expenses associated with the injuries inflicted by the Defendant.

COUNT ONE

10. Plaintiff asserts that Defendant is guilty of the tort of negligence based upon the excessive force used in the play of the game and which caused the injury to Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory and punitive damages in an amount determined by a jury, plus interest, attorneys' fees, costs, expenses resulting from the negligence and such other relief as this Court deems just and proper.

COUNT TWO

11. Plaintiff asserts that Defendant is guilty of the tort of battery as a result of Defendant's actions when he struck the Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory and punitive damages in an amount determined by a jury, plus interest, attorneys' fees, costs, expenses resulting from the battery and such other relief as this Court deems just and proper.

/s/ Edmund Knox Coleman VII
Edmund Knox Coleman VII (COL044)
Attorney for the Plaintiff

TRIAL BY STRUCK JURY DEMANDED

/s/ Edmund Knox Coleman VII
Edmund Knox Coleman VII (COL044)
Attorney for the Plaintiff

6. Admitted.

7. Defendant denies the material allegations contained in paragraph 7 of Plaintiff's Complaint and, therefore, denies the same and demands strict proof thereof.

8. Defendant denies the material allegations contained in paragraph 8 of Plaintiff's Complaint and, therefore, denies the same and demands strict proof thereof.

9. Defendant denies the material allegations contained in paragraph 9 of Plaintiff's Complaint and, therefore, denies the same and demands strict proof thereof.

COUNT ONE

10. Defendant denies the material allegations contained in paragraph 10 of Plaintiff's Complaint and, therefore, denies the same and demands strict proof thereof. A response is not required from this Defendant to the ad damnum clause, but to the extent, one is deemed to be required, Defendant denies the same and demands strict proof thereof.

COUNT TWO

11. Defendant denies the material allegations contained in paragraph 10 of Plaintiff's Complaint and, therefore, denies the same and demands strict proof thereof. A response is not required from this Defendant to the ad damnum clause, but to the extent, one is deemed to be required, Defendant denies the same and demands strict proof thereof.

FIRST AFFIRMATIVE DEFENSE

Plaintiff's Complaint and various portions thereof fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Unless expressly admitted, Defendant denies the material allegations of Plaintiff's Complaint and demands strict proof thereof.

THIRD AFFIRMATIVE DEFENSE

Defendant pleads not guilty.

FOURTH AFFIRMATIVE DEFENSE

Defendant pleads the general issue.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's Complaint in whole or in part is barred by the applicable statute of limitations.

SIXTH AFFIRMATIVE DEFENSE

Defendant denies that Plaintiff was injured or damaged by any actions or inactions by the Defendant.

SEVENTH AFFIRMATIVE DEFENSE

Defendant pleads lack of causation.

EIGHTH AFFIRMATIVE DEFENSE

Defendant asserts that there is no proximate cause between the actions or inactions alleged by Plaintiff and the alleged resulting damages.

NINTH AFFIRMATIVE DEFENSE

Defendant asserts the doctrine of assumption of the risk.

TENTH AFFIRMATIVE DEFENSE

Defendant asserts that any damages to Plaintiff was caused by the actions or inactions of a third party or an intervening cause.

ELEVENTH AFFIRMATIVE DEFENSE

Defendant asserts that Plaintiff is estopped from asserting any claim against the Defendant or, alternatively, has waived any claim against Defendant.

TWELFTH AFFIRMATIVE DEFENSE

Defendant asserts the defense of contributory negligence.

THIRTEENTH AFFIRMATIVE DEFENSE

Defendant asserts that Plaintiff has not been damaged in any manner including, but not limited to, financial damage, physical damage and/or mental anguish.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiff is not entitled to mental anguish damages.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims for punitive damages violate the Defendant's rights guaranteed by the Constitution of the State of Alabama.

SIXTEENTH AFFIRMATIVE DEFENSE

Defendant asserts all other caps and limitations on damages, including punitive damages, as set forth in the Code of Alabama (1975).

SEVENTEENTH AFFIRMATIVE DEFENSE

Defendant pleads justification.

Respectfully submitted,

/s/ Maria Weaver Gonzalez
Maria Weaver Gonzalez (GON 043)
Attorney for the Defendant

The play during the semifinal game in which I was injured was pretty rough – a lot of grabbing and bumping. It seemed like the level of physicality increased as the game progressed. I know that I had bumped Linn Anderson pretty hard when the Stars were attacking our goal a few minutes before I was injured. I did not see his hit coming at all. I was charging hard with the ball toward their net – we needed to win this game to get into the finals and get revenge for losing to them last year in the championship game. Time was running out, and I was focused on the net when I was hit from behind – I never saw it coming. Linn never even went for the ball, s/he just nailed me. I have never been hit like that before in all my years of playing soccer. But, I was not surprised that it was Linn who sucker-punched me. S/he is a dirty player and our coaches always tell us to watch out for him/her. I remember hearing about how in another game s/he "accidentally" kicked an opposing player, who had slipped and fell, in the head while going for the ball. I am glad that s/he got kicked out of the game, though my injury cost us a place in the finals. I may only be 5' 7" and 145 pounds soaking wet, but I can kick a penalty shot with the best of them if I say so myself. My kick would have kept us even with Centreville. I know we would have won if I would have stayed in the game.

I just hope that this pain in my back goes away at some point. The ER doctors were really concerned that I may not be able to walk normally again, especially after the damage done to my back during the car wreck. With intense physical therapy, however, they now think I will be able to walk without pain in a few months, though I may never be able to play soccer again. Presently I am on real pain medication, not just Advil. I worry about getting addicted to painkillers, but I struggle to function without them. Even my studies have suffered because of my injury – I just cannot focus for any length of time. I heard that Linn is bragging about knocking me out of the

game and that because of him they were able to repeat as champions. After this lawsuit, neither s/he nor his/her coach are going to savor the win over us or that trophy.

Shannon Spain

broken bone, major contusion, or concussion each night I work the ER during a high school sporting event. Soccer is supposed to be a “contact-free” sport, but that is far from the case, though it is less violent than football.

The injury sustained by Shannon Spain was significant and troubling. Shannon entered the ER on a backboard, strapped down from head to toe to reduce mobility. Fortunately, such precautions were taken at the high school by the paramedics. Shannon suffered a deep contusion of the spine with edema in the lower lumbar area. Shannon complained of sharp pain emanating down through the legs into the appendages. Loss of motor skills was noted, though paralysis was not present to any real degree. Shannon was kept in the hospital for two days, primarily for observation.

Shannon’s injuries were unusual in that they were more commonly associated with those sustained during a major car wreck or someone falling backwards onto a hard surface, rather than during a sporting event, especially a soccer match. Typically, soccer injuries are sprained ankles, twisted knees, blown ACLs, and deep contusions on the legs, with an occasional head injury. Shannon’s back injury, however, had to be caused by a sudden force to the lower lumbar region – an uncommon event in a soccer match. I played a lot of soccer while in Africa and never saw one back injury.

Moreover, during my four years in the ER, I have never treated a soccer player for injuries like the one sustained by Shannon during this game. The MRI and X-rays did show some degeneration and prior damage of the vertebrae at L5, but Shannon’s injury spanned vertebrae L4 and L5. Shannon had to leave the hospital in a wheelchair, and I prescribed painkillers for the first week out of the hospital. I have heard that Shannon has undergone extensive physical therapy, though Shannon is not one of my regular patients since I only work in the ER.

Shannon's parents were very distraught and agitated when they were in the ER. I heard them talking in hurried, hushed voices to each other and Shannon's mother saying something along the lines of: "I knew we should not have allowed Shannon to continue to play soccer. I thought the spine was just too sensitive to risk a jolt or sudden hit." I was not really sure what they were talking about, and I was just focused on making sure that Shannon did not end up a paraplegic.

Dr. Blake Norman, M.D.
Emergency Room Physician

sitting near the top of the stands because I wanted a good view of the entire field and was around mid-field, though I was a little more toward the side of the field away from where Shannon was injured. I saw the play unfold from its beginning. Shannon, a scrappy player, had made a nice slide tackle on the ball to steal it from the Centreville striker, Anderson I believe, and started dribbling it down the field.

Shannon had been harassing the opposing team all night, and the play was getting intense on the field – after all, it was a scoreless game between two major rivals, what else is expected. Anyway, Shannon was attacking the goal. I turned to my assistant coach and said: "Just watch, there is no way Centreville is going to let the scrawniest player on the field score the winning goal." I turned back to look at the field just in time to see a Centreville player, I know it was Anderson who received the red card, crash into Shannon from behind with no intent to go after the ball. That Centreville player was going to stop Pleasantville at all costs – that is their modus operandi. We play them every year and I always tell my players to “watch their back” against that team.

The next thing I know, Shannon has lost the ball and is sprawled out on the field, writhing in obvious pain. I always admired Shannon for playing soccer after hearing about the car wreck, and was surprised with Shannon’s skill level after missing a complete season. In all my years of coaching soccer, I have never seen such a play or injury. Sliding tackles are part of the game, but a player is supposed to go after the ball. There is no way to reach the ball directly behind a player.

Anderson was rightly thrown out of the game, and should have been banned from the championship game as well. Don’t worry, we will get them next year. We will be ready for those hoodlums next season.

Terry Dillon
Head Coach Mayberry Mudcats

whole time. Shannon's dad has always had it out for me because I am bigger, faster, and a better player. Don't get me wrong, I'll be the first to admit that Shannon is a good player and is very competitive, but Shannon's dad never liked that Shannon's teams always came in second place behind mine. I heard through the grapevine that Shannon's dad was furious when he heard that I was being recruited by the two best Division I soccer teams in the country.

Games between Pleasantville and Centreville are always very competitive. Pleasantville High and Centreville are the only two high schools in Pleasantville and Pleasantville High is our biggest rival in every sport. However, this semifinal game with Pleasantville was brutal. I had heard before the game that Pleasantville was going to try their best to take me out early by whatever means necessary. Shannon's dad ran into my mom at the mall the day before the game and said that, "Linn will either be watching the game from the bench or the stretcher, either way, he's gonna be out of the game pretty early tomorrow."

The day of the game the stands were packed and everyone was jumping up and down and screaming so loud we couldn't even hear our coach. Referees red-carded two Pleasantville players within the first ten minutes. One of our players went down with a sprained ankle from a Pleasantville hit. I got a yellow card a few minutes later, but that is not unusual for me. I always play to win.

The game was scoreless going into the half. I got possession of the ball and was charging towards the Pleasantville goal. Next thing I know, I get laid out right in front of the goal by Shannon. Shannon just laughed and kept on running. My leg was a little sore from the hit, but Coach told me just to shake it off and get back at it. Later in the game near the end, Pleasantville got possession and was headed towards our goal. They passed it to Shannon and s/he was charging. There was no way I was going to let them win. I took off as fast as I could towards the

ball and was one step ahead of Shannon when I slid to tackle the ball. I know Shannon says I came from behind and that s/he never saw me but that is totally not true. If Shannon did not see me, why did he stick his arm out when I came up beside him? I did get thrown out of the game for the hit, but the call was completely wrong. I did not hit him any harder than Pleasantville hit our players and absolutely no harder than he hit me earlier in the game. I cannot help it if Shannon is smaller than me. I am 5'11 and I understand Shannon is around 5'7.

I feel sorry for Shannon but not because I did anything wrong. I am a physical player, but soccer is a physical sport; it's not flag football. You hit and you get hit-- that's the name of the game.

Linn Anderson

where I come from. I could tell from the video that there were a lot of people at the game that day. There was a lot of background noise and people jumping up in front of the camera, but it looked like a good play for the ball.

I have had several segments on my program devoted to violence in sports in today's world. Soccer is the biggest sport in the world. Only in the last twenty years or so has America come on board and really soccer has only taken off in the last decade. Most people think football is the most physical sport around, but that is not the case. More broken bones, injuries, and emergency room visits are attributable to soccer every year than football or any other sport.

It is unfortunate that Shannon Spain was injured, but I am of the opinion that Shannon Spain should not have been playing in the first place. Sure, Linn Anderson appears on the tape to be a very competitive, tough player, but no more so than some of the players that I have played with and against. Spain should not have been on that field with those pre-existing injuries. Anyone with that kind of pre-existing injury and in that condition should not be playing soccer in the first place. Spain's small stature just compounds the risk. Anytime you put a 5'7 small-framed player in a very physical game against players who are 5'11 you are asking for trouble. Anderson may have been playing the game a little fast and loose and maybe pushing the edge of permissive physicality, but the play was legitimate. Anderson was parallel to Spain and he made a play for the ball. Anderson actually made contact with the ball. His/her contact with Spain was incidental to the play. These kids today should either toughen up or bring their pom-poms and sit it out.

Cameron Strong

huge because Pleasantville, the underdog, was a huge favorite. I heard there were scouts from every major Division I soccer program in the tri-state area. I even saw the coach from the Mayberry Mudcats there scouting out the players. He was probably checking the team out since they were set to play the winners in the state finals. The Mayberry Mudcats coach has supposedly harbored a grudge against the Centreville Stars ever since they picked another coach over him for the Stars' head coaching position. I don't know if that is true or not since it was before my time.

Anyway, the game was tied at zero. Before halftime, Spain did hit Anderson when Anderson was about to kick one in for a goal. Anderson had a clear shot and would have made it. Everyone knows he is the best player in the state had it not been for Spain's sliding tackle. Spain took out Anderson and I was sure that Anderson was out of the game. Anderson got up and kept on going.

Later in the game, Spain had possession of the ball and was heading towards the Centreville goal. Spain was really moving down the field, but Anderson was quickly catching up with him/her. Spain went for the goal and Anderson went for the ball. The next thing I saw was Spain on the ground.

Anderson may have gone in for the ball harder and faster than I would have, but it looked like a fair play. It was obvious that Anderson was going for the ball.

Taylor Brown

EXHIBIT 1

**CCGH
CHAPEL COUNTY GENERAL HOSPITAL
131 East Fifteenth Street
Pleasantville, Alabama 36333**

Name: Shannon Spain DOB: 2/15/2000 SS#: 999-XX-3423

INITIAL PATIENT DATA:

Date: 5/15/16 Arrived By: Ambulance Time: 1652

Temp: 98.6 Pulse: 100 Reap: 22 B/P: 114/73 WT: 145

Allergies: NKA

Home Medications: Multiple vitamins, Advil for previous severe back injury

TRIAGE ASSESSMENT:

severe trauma to the lower lumbar region

ASSESSMENT~HISTORY BY NURSE:

1652 - Arrived per ambulance. Pt involved in accident at soccer game. Pt strapped to backboard and rendered immobile. PT complains of severe pain down back and legs. Contusions to the right forearm and right patella. Right ankle edema. Lower back edema and swelling. Pt says that s/he was previously involved in serious car accident and injured in same region approx. 5 years previous.

MEDICATIONS/PROCEDURES:

Demerol 25 mg. IM TID PRN

X-Rays: C-Spine, Spine, skull and rt. ankle. MRI and Xrays show some degeneration and prior damage of the vertebrae at L5, injury spanned vertebrae L4, & L5.

DIAGNOSIS:

Contusions, possible soft tissue damage, edema

DISCHARGE:

home assisted by family via private vehicle

INSTRUCTIONS TO PATIENT:

DC'd to visit orthopaedic specialist 1 week.

Continue Pain meds as needed

Return PRN

/s/ Blake Norman, MD
Signature of Physician

/s/ Kay Turner, R.N.
Signature of Nurse

EXHIBIT 2

Rules for Chapel County Secondary School Athletic Association Soccer Referees

(Abridged from Constitution, and commented to emphasize for referees)

1. **1. Unlimited substitution is permitted, but only at the following**

situations:

goal kicks

goals

when play has been stopped for an injured player (only the injured player may be changed)

half-time

No substitutions are permitted on throw-ins

Substitutions MUST only be made according to FIFA standards. The player leaving the field MUST have left the field before the replacement can enter the field.

It is strongly advised that no players be allowed to enter until all players exiting the field have actually left the field. In high school games, some teams change 7 players at one time, so insist all are off before anyone enters. Do NOT re-start play until all players have entered and have reasonably taken their correct position on the field. All players exiting must exit at or near the team bench, not on the opposite side of the field.

2. A maximum of 18 players are permitted per team for the game.

3. Yellow and Red Cards

Players receiving a yellow card will be removed from the game until the next allowable substitution. The team will be permitted to put a substitute on the field at the time that the yellow card is given. The yellow carded player is the only player who may be replaced at that time and may re-enter that game at a regular substitution.

Players receiving a red card, must leave the field for the remainder of that game (no substitution allowed) and may not play in his/her team's next game.

A coach who is dismissed during a game causes the automatic forfeiture of the game. The coach will be brought before a Board of Reference for further disciplinary action.

4. Uniforms:

Teams must wear similar coloured jerseys numbered on the back. The entire team must dress in similar colored shorts and similar colored socks. Shorts may not be cutoffs.

It is the responsibility of the home team to avoid conflicting colors.

Jewelry may not be worn by participating players.

Shinguards must be worn by participating players.

Coaches may inspect the opposing teams footgear and refer players to the referee for a final decision.

Head gear worn for religious reasons is allowed providing there is no hazard to other players, as determined by the referee.

5. Linespeople: Each team is responsible for providing a linesperson for the entire duration of all games. Club linespeople may be team players awaiting substitution provided their team shirts are not visible. Linesmen must be use

6. Procedures for Rainy Days

a) Home team is to advise the visiting team prior to 1:00 p.m. on the status of the game.

b) Referees are instructed to call the school regarding the status of the game.

The referee must talk either to the coach, assistant coach, head of Physical Education department, or secretary at the school to confirm that a game has been cancelled. If the game is cancelled, the referee must record the name of the person contacted, and the time contacted, to provide proof that they were notified that the game has been canceled.

7. Responsibility of the Home Team

The game sheet, supplied by each coach, must be completed by each head coach prior to the start of the game. Game sheets are to be given to the referee before the start of the game. The home team is responsible for providing a playable field with markings, mesh on nets, corner posts, game ball, first aid kit and game sheet. Failure to comply will result in a forfeiture of the game, as decided by the referee before the game.

The above point is from the ROPSSAA constitution, BUT it is the referee's DUTY to make every attempt to play the game. Lines could be washed out by a storm, so play without them if you can. Nets are not required by FIFA, so play without them. Corner posts are mandatory by FIFA, but many local games have no corner flags, so be certain to play the game. Make certain that whatever you use as corner flags, that they are safe for the players.

Officiating expenses for all league and play-off games will be the responsibility of the home school.

For the 2008-2009 high school soccer season the following rates were approved.

length of game Rate/1 official rate/assistant (playoff games only)

35 minutes \$40.00 \$25.00

40 minutes \$45.00 \$30.00

8. Length of Game:

Each league game will consist of two 35 minute halves with at least a five minute half time break.

Each playoff game will consist of two 40 minute halves with a ten minute half time break.

9. All semi-final and final playoff games shall have 3 qualified referees - 2 assistant referees, and 1 referee.

10. A game may be forfeited if a team does not arrive within 15 minutes

of the starting time. The team that forfeits must pay the referee cost.

We must use our discretion in this matter. School buses may be delayed taking the team to a game, or an accident with the bus could delay the game. Referees are advised to make every reasonable effort to play the game.

11. DEPARTMENT (of teams):

Competitors and Coaches are expected to behave in a sportsmanlike manner

Teams will shake hands under the supervision of the coach and referee.

School teams shall at all times be under the supervision of an approved staff member of the school which they represent, prior to, during and after the completion of the competition and until all of the team has left the site.

12. Ties in Play-off Games

In the event of a tie in a play-off game, extra time will consist of two ten-minute halves with golden goal in effect.

If the score is still tied after extra time, each side will take five alternating penalty shots to declare a winner.

If the score is still tied after 5 penalty shots from both teams, a series of sudden-death alternating penalty shots will be taken.

Additional responsibilities and requirements of the Referee or assistant referee:

1. Game appointments

You are responsible for the game once you accept an appointment from the referee appointer.

If you cannot make the game, you must return the game to the appointer as soon as possible after becoming aware of your unavailability.

Returning games without a valid reason will have you removed from the list of officials for this league.

If an emergency occurs on the day of the game, please contact the appointer as soon as possible. If you cannot reach the appointer, try to find a qualified replacement for yourself.

Be aware that non-appearance at a game you have accepted to officiate could result in your being fined the game fee

2. Status of official

Must be a registered Official

Grade 3 level or higher

Active member of their branch

Be recommended by the branch if not currently on the list of officials for this league

3. Evaluation

From time to time each official must be assessed to maintain their status in this league. It will be necessary for each referee in the league to be assessed by the association once every three years, and to have a satisfactory performance on this assessment. This cannot be implemented this year, but will be necessary to be completed in the 2003 soccer season for maintaining your place in the league in the 2004 season. ([Spring 2004])

Additional information:

This league is well regulated. You must be certain to enforce the laws!

A) A player who accumulates three yellow cards will leave the field for the remainder of the game in which he received the third card. Substitution will be allowed at this time. The player may not play in his/her team's next game.

B) Yellow cards will not carry over from the season in which they were accumulated to the following season.

C) If a player receives 2 red cards in one season that player will be suspended for the remainder of the season including playoffs.

D) Red cards will carry over from the season in which they were accumulated to the following season, up to a maximum of a two game suspension (this is in the case of a player receiving their second red card in their last game of the season). Any red card involving a violent act may result in a minimum 3 game suspension or a more severe penalty at the discretion of the convenor.

E) Any coach that plays a suspended player will forfeit the game in which the suspended player participates. The coach will be brought before a Board of Reference for further disciplinary action.

F) Teams receiving a total of four red cards will complete the game, and their status must be reviewed by the Convenor. Each subsequent red card after 4, must also be reviewed.

G) A coach who is dismissed during a game causes the automatic forfeiture of the game. The coach will be brought before a Board of Reference for further disciplinary action.

EXHIBIT 3

A Commentary on the Laws of the Game and the "BIG SIX"

By: Cameron Strong

So when do you get a direct free kick? The answer is rather simple at first glance—commit one of the "big six" and you are lining up for a direct free kick. The initial section of Law 12, "direct free kick", lists a set of six offences which, if committed against an opponent in a manner that the referee judges to be "careless, reckless or with excessive force", result in a DFK to the non-offending team. The offences are kicking or attempting to kick, tripping or attempting to trip, jumping at, charging, striking or attempting to strike, and pushing.

Law 12 further provides that, if a player commits any of these six offenses inside his own penalty area (PA), the opposing team will be awarded a penalty kick (PK). While the offence must occur within the PA, the ball does not have to be in the PA for a PK to be awarded.

Commentary

So the word is out. Even in the "gentlemanly" game of soccer, people sometimes lose control and do things that are not exactly appropriate. To be a foul, the first six of these, listed above, must not only occur, but must be committed in a manner "considered by the referee to be careless, reckless, or using excessive force".

First off, what's "careless or reckless?" Synonyms for these words are rash, negligent, wild, unconcerned, neglectful, improvident and a few others, but you get the idea. While excessive force is harder to define, let's just agree that it's a bit more violent than the norm since the referee makes the decision on the field anyway (and what's an "excessive" push in a U-8 game might not even be noticed in a professional match).

So there we have it. Three things that you get in trouble for even trying to do (kicking, tripping, striking) and a couple that you have to actually accomplish in order to create a foul (jump at, push). And by the way, possession of or proximity to the ball isn't even involved in any of them. If A trips B while the ball is 60 meters away,

it can still be a foul. However, all of these do require that the action be directed at an opponent. Therefore, if a keeper decides to strike her own defender for an especially poor play, **this** section of the law is **not** applicable. However, it's quite likely that the referee will decide that this is violent conduct under a later section of law 12 and act accordingly.

Right from the git go, be aware that if a player stands there and sticks her foot out and clearly trips an opponent on the way past or runs up to another player and kicks her, the referee will judge this to be either careless, reckless or with excessive force and call a foul. It seems to get a little murkier, however, when the non-offending player has the ball, as either

the trip or kick might possibly be an unintended consequence of trying to get the ball. But have no fear, intent has nothing to do with this one. If a player tries to steal the ball and, through carelessness or recklessness, misses and takes the attacker to the ground, the referee will call a trip. In fact, even if she "gets ball" prior to the opponent hitting the deck, the referee might judge the "getting ball" to be just an unintended consequence of the takedown and call a foul.

Now, with all of that said, be aware that any of these offences, if committed violently enough, can land the perpetrator on the bad side of a yellow or even red card for serious foul play or violent conduct.

EXHIBIT 4

MAYBERRY MUDCATS

2016 Varsity Soccer Schedule

Date	Opponent	Time / W,L,T	Location
March 7	Black & Gold Game	5:00 PM	Mayberry
March 14 Jamboree		9:00 AM	Mayberry
March 17	Mayberry 6 - Danville 0	Win	Danville
March 19	Mayberry - Columbus North	Win	Columbus North
March 26	Mayberry 6 - Harrison 0	Win	Mayberry
March 31	Mayberry 1 - Noblesville 0	Win	Noblesville
April 3	Mayberry 3 - Mishawaka 2	Win	Bloomington Karst Park
April	Mayberry 6 - Roncalli 0	Win	Bloomington Karst Park
	Dunbar 1 - Mayberry 2	Win	
April 11	Mayberry 4 - Avon 3	Win	Kuntz Stadium

	April 14	Mayberry 2 - Plainfield 1	Win	Plainfield
	April 16	Hamilton SE 2 - Mayberry 5	Win	Mayberry
	April 18	Mayberry 4 - Lafayette Jeff 2	Win	Mayberry
	April 23	Zionsville 1 - Mayberry 2	Win	Zionsville
	April 25	Mayberry 4 - Centreville 5	Loss	Center Grove
	April 28	Terron 2- Mayberry 3	Win	Mayberry
	May 2	Westfield 0- Mayberry 1	Win	Westfield
	May 5	McCutcheon 2- Mayberry 3	Win	McCutcheon
	May 7	Davis 0 Mayberry 1	Win	Mayberry
	Games			
	May 12	Sectionals		

EXHIBIT 4

Exhibit 5

TRANSCRIPT OF VOICEMAIL FROM SHANNON SPAIN TO LINN ANDERSON

Message recorded: 9:05pm
Date: May 12, 2016
Transcribed by: CWS Court Reporting,
Date Transcribed: Inc. January 5, 2017

ANDERSON: Hello, you have reached the voicemail for Linn Anderson. I cannot come to the phone right now, but please leave a message after the tone and I will return your call. Go Stars!

SPAIN: Hey Linn, this is Shannon. After the game next week, you won't be seeing anything but stars. Our coach says you will be gunning for us, but we'll be prepared. You have taken us out for the last time. You have been playing too rough for too long and you know what they say: if you cannot beat 'em, join em. I'll be watching my back, maybe you should be, too.

END OF TAPE

STATE OF ALABAMA)
)
COUNTY OF CHAPEL)

I CWS Court Reporting, Inc. do hereby swear and affirm that the foregoing transcription is a true and correct transcription of the tape provided to me by counsel for Linn Anderson and that the nothing was omitted from the transcription.

By: Sonny Tiper
Its: President

Fouls and misconduct are penalised as follows:

Direct free kick

A direct free kick is awarded to the opposing team if a player commits any of the following seven offences in a manner considered by the referee to be careless, reckless or using excessive force:

- kicks or attempts to kick an opponent
- trips or attempts to trip an opponent
- jumps at an opponent
- charges an opponent
- strikes or attempts to strike an opponent
- pushes an opponent
- tackles an opponent

A direct free kick is also awarded to the opposing team if a player commits any of the following three offences:

- holds an opponent
- spits at an opponent
- handles the ball deliberately (except for the goalkeeper within his own penalty area)

A direct free kick is taken from the place where the offence occurred (see Law 13 – Position of free kick).

Penalty kick

A penalty kick is awarded if any of the above ten offences is committed by a player inside his own penalty area, irrespective of the position of the ball, provided it is in play.

Indirect free kick

An indirect free kick is awarded to the opposing team if a goalkeeper, inside his own penalty area, commits any of the following four offences:

- controls the ball with his hands for more than six seconds before releasing it from his possession
- touches the ball again with his hands after he has released it from his possession and before it has touched another player
- touches the ball with his hands after it has been deliberately kicked to him by a team-mate
- touches the ball with his hands after he has received it directly from a throw-in taken by a team-mate

An indirect free kick is also awarded to the opposing team if, in the opinion of the referee, a player:

- plays in a dangerous manner
- impedes the progress of an opponent
- prevents the goalkeeper from releasing the ball from his hands
- commits any other offence, not previously mentioned in Law 12, for which play is stopped to caution or send off a player

The indirect free kick is taken from the place where the offence occurred (see Law 13 – Position of free kick).

Disciplinary sanctions

The yellow card is used to communicate that a player, substitute or substituted player has been cautioned.

The red card is used to communicate that a player, substitute or substituted player has been sent off.

Only a player, substitute or substituted player may be shown the red or yellow card.

The referee has the authority to take disciplinary sanctions from the moment he enters the field of play until he leaves the field of play after the final whistle.

A player who commits a cautionable or sending-off offence, either on or off the field of play, whether directed towards an opponent, a team-mate, the referee, an assistant referee or any other person, is disciplined according to the nature of the offence committed.

Cautionable offences

A player is cautioned and shown the yellow card if he commits any of the following seven offences:

- unsporting behaviour
- dissent by word or action
- persistent infringement of the Laws of the Game
- delaying the restart of play
- failure to respect the required distance when play is restarted with a corner kick, free kick or throw-in
- entering or re-entering the field of play without the referee's permission
- deliberately leaving the field of play without the referee's permission

A substitute or substituted player is cautioned if he commits any of the following three offences:

- unsporting behaviour
- dissent by word or action
- delaying the restart of play

Sending-off offences

A player, substitute or substituted player is sent off if he commits any of the following seven offences:

- serious foul play
- violent conduct
- spitting at an opponent or any other person
- denying the opposing team a goal or an obvious goalscoring opportunity by deliberately handling the ball (this does not apply to a goalkeeper within his own penalty area)
- denying an obvious goalscoring opportunity to an opponent moving towards the player's goal by an offence punishable by a free kick or a penalty kick
- using offensive, insulting or abusive language and/or gestures
- receiving a second caution in the same match

A player, substitute or substituted player who has been sent off must leave the vicinity of the field of play and the technical area.